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UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

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UNITED STATES OF AMERICA : Hon. Cathy L. Waldor  
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v. : Mag. No. 18-7246  
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NADER AHMED : **CRIMINAL COMPLAINT**  
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:

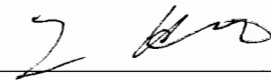
I, George L. Herbert, being duly sworn, state the following is true and correct to the best of my knowledge and belief:

**SEE ATTACHMENT A**

I further state that I am a Special Agent with the United States Department of Homeland Security, Homeland Security Investigations, and that this complaint is based on the following facts:

**SEE ATTACHMENT B**


continued on the attached page and made a part hereof.

  
\_\_\_\_\_  
George L. Herbert, Special Agent  
U.S. Department of Homeland Security  
Homeland Security Investigations

November 20, 2018  
Date

at Essex County, New Jersey  
County and State

Honorable Cathy L. Waldor  
United States Magistrate Judge  
Name and Title of Judicial Officer

  
\_\_\_\_\_  
Signature of Judicial Officer

## **ATTACHMENT B**

I, George L. Herbert, am a Special Agent with the Department of Homeland Security, Homeland Security Investigations ("HSI"). I am fully familiar with the facts set forth herein based on my own investigation, my discussions with other law enforcement officers, and my review of reports, documents, and other items of evidence. Where statements of others are related herein, they are related in substance and in part. Because this Affidavit is being submitted for the sole purpose of establishing probable cause to support the issuance of a complaint, I have not set forth each and every fact that I know concerning this investigation. Where I assert that an event took place on a particular date, I am asserting that it took place on or about the date alleged.

### **Background**

1. At all times relevant to this Complaint, defendant Nader Ahmed ("AHMED") was a resident of Jersey City, New Jersey.

### **The Investigation**

2. "The Website"<sup>1</sup> is an online child-pornography website located on the darknet with a Tor-based web address known to law enforcement. On or about March 5, 2018, law enforcement took down The Website and arrested the individual operating The Website. Upon taking down The Website, law enforcement officers learned of information regarding the activity of The Website's users. The investigation revealed that AHMED was a customer of The Website, and that AHMED shared multiple files on The Website depicting child pornography.

3. Specifically, The Website user data collected by law enforcement reveals that AHMED uploaded two videos depicting child pornography, one on or about January 12, 2018, and one on or about January 13, 2018. The user data also shows that the videos uploaded by AHMED were ultimately downloaded by other subscribers of The Website. The two videos AHMED uploaded had titles indicative of child pornography, as did the titles of the files that he downloaded.

4. Your affiant has reviewed the videos referenced in paragraph 3. The file names and descriptions are as follows:

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<sup>1</sup> To protect the confidentiality and integrity of the ongoing investigations surrounding The Website, specific names and other identifying factors have been replaced with generic terms and the website will be identified herein as "The Website."

File Name	Upload/Download Date	Description
"14 year old shows [REDACTED]"	<ul style="list-style-type: none"> <li>• Uploaded by AHMED on Jan. 13, 2018</li> <li>• Downloaded from AHMED by two distinct website subscribers on Jan. 16 and 26, 2018</li> </ul>	The video depicts a young girl who appears from her small stature and youthful appearance to be approximately 14 years old. The child is on the floor naked and appears to be communicating with someone via phone or computer while she masturbates and penetrates herself with a sex toy.
"16 year old girl [REDACTED]"	<ul style="list-style-type: none"> <li>• Uploaded by AHMED on Jan. 12, 2018</li> <li>• Downloaded from AHMED by two unique website subscribers on Jan. 12 and 13, 2018</li> </ul>	The video depicts a young girl who appears from her small stature and youthful appearance to be approximately 16 years old. The child undresses in the video and masturbates.
"8 year old sister [REDACTED]"	N/A	This video is approximately four minutes long and depicts a prepubescent girl who appears from her small stature, youthful appearance, lack of breast development, and lack of pubic hair to be approximately 8 years old. The child is naked and positioned on top of what appears to be an adult male. The child is being penetrated by the male's penis.
"Uncle makes his 7yo [REDACTED]"	N/A	The video depicts a prepubescent girl who appears from her small stature, youthful appearance, lack of breast development, and lack of pubic hair to be approximately 7 years old. The video depicts the adult

		male inserting his penis into the child's mouth and subsequently penetrating the child's anus.
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5. On or about November 20, 2018, law enforcement executed a search warrant at AHMED's residence in Jersey City, New Jersey. At the residence, law enforcement discovered computer equipment belonging to AHMED.

6. During and after the search of the residence, and after being advised of his Miranda rights, AHMED admitted to law enforcement, among other things, in substance and in part, that the computer equipment was his and that he used The Website to view and receive child pornography. AHMED additionally admitted that he has been downloading and masturbating to child pornography for more than a decade.

7. A preliminary forensic review of the computer equipment seized from AHMED's residence revealed approximately 500 files titled with names indicative of child pornography, as defined by Title 18, United States Code, Section 2256(8). AHMED additionally admitted that he downloaded nearly the entirety of his collection of child pornography from The Website.

8. Based upon my education, training and experience, and my discussions with other law enforcement officers, and to the best of my knowledge, the child pornography files described in paragraph 3 above, traveled in interstate commerce, that is, the files were downloaded and/or uploaded by users, including AHMED, via The Website.